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6 Attorneys for Defendant
   G & B GROCERS dba RANCHO CORDOVA
7 GROCERY OUTLET *[erroneously sued as G & B GROCERS*
   doing business as Grocery Outlet]

8

9   UNITED STATES DISTRICT COURT

10   EASTERN DISTRICT OF CALIFORNIA

11

12 MAURSHAE SMITH, on behalf of herself and   Case No: 2:21-cv-01504-MCE-AC
    all others similarly situated,
13
                        Plaintiff,   **JOINT STIPULATION TO CONTINUE
14   DEADLINES IN INITIAL PRETRIAL
           v.   SCHEDULING ORDER; ORDER**
15
    G & B GROCERS, a California corporation,
16 doing business as Grocery Outlet, and DOES 1-
    10,
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                        Defendants.   Complaint Filed: August 22, 2021
18   Trial Date: None Set

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1   IT IS HEREBY STIPULATED AND AGREED, between Plaintiff MAURSHAE SMITH's
2   ("Plaintiff"), G & B GROCERS dba RANCHO CORDOVA GROCERY OUTLET *[erroneously sued*
3   *as G & B GROCERS doing business as Grocery Outlet]* ("Defendant"), through their respective counsel
4   of record, as follows:

5   WHEREAS, on August 23, 2021, the Court entered an Initial Scheduling Order (ECF No. 4);

6   WHEREAS, this Joint Stipulation is not entered into with the intent to delay;

7   WHEREAS, by continuing the discovery and other deadlines set forth herein, there is no
8   prejudice to any party;

9   WHEREAS, the parties desire to avoid unnecessary costs associated with these deadlines before
10 completing essential non-expert, and fact discovery while the Parties continue to discuss potential
11 resolution, as incurring said costs on both sides may be an impediment to resolving this case;

12   WHEREAS, good cause exists for granting the Parties' request to extend the following deadlines
13 by thirty (30) days in accordance with Federal Rules of Civil Procedure Rule 29;

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JOINT STIPULATION TO CONTINUE DEADLINES IN INITIAL PRETRIAL SCHEDULING ORDER; ORDER
FP 45223522.1

NOW THEREFORE, the Parties respectfully request that the Court modify its Second Amendment to the Scheduling Order, ECF No. 108 and continue the following deadlines:

Event	Existing Deadline	Requested Deadline
Deadline to complete all non-expert discovery	September 21, 2022	November 21, 2022
Deadline to complete fact discovery	October 21, 2022	December 20, 2022
Deadline to file dispositive motions	November 21, 2022	January 20, 2023
Deadline to exchange expert disclosures	December 20, 2022	February 21, 2023
Deadline to serve supplemental list of expert disclosures	January 19, 2023	March 20, 2023

IT IS SO STIPULATED.

DATE: September ___, 2022   NUNES WORKER RIGHTS LAW, APC

By: _____
     Anthony J. Nunes

     Attorneys for Plaintiff
     MAURSHAE SMITH

Dated: September __, 2022   FISHER & PHILLIPS LLP

By: _____
     Alden J. Parker
     Christopher S. Alvarez

     Attorneys for Defendant
     G & B GROCERS dba RANCHO CORDOVA
     GROCERY OUTLET *[erroneously sued as
     G & B GROCERS doing business as
     Grocery Outlet]*

JOINT STIPULATION TO CONTINUE DEADLINES IN INITIAL PRETRIAL SCHEDULING ORDER; ORDER
FP 45223522.1

ORDER

Having read and considered the Parties' Joint Stipulation, for good cause appearing, IT IS HEREBY ORDERED as follows:

1.   Deadline to complete all non-expert discovery: November 21, 2022;

2.   Deadline to complete fact discovery: December 20, 2022;

3.   Deadline to file dispositive motions: January 20, 2023;

4.   Deadline to exchange expert disclosures: February 21, 2023; and

5.   Deadline to serve supplemental list of expert disclosures: March 20, 2023.

IT IS SO ORDERED.

DATED: September 26, 2022

_____
MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE

JOINT STIPULATION TO CONTINUE DEADLINES IN INITIAL PRETRIAL SCHEDULING ORDER; ORDER
FP 45223522.1